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REMARKS

Claims 1-27 remain pending in this application. All claims have been rejected in the present Office Action.

The Examiner rejected Claims 25-27 under 35 U.S.C. §112, first paragraph. The objected to recitations of “collecting data representing a social category at a web site” and “means for collecting data representing a social category at a web site” were removed from Claims 25-26 and 27, respectively.

The Examiner further rejected Claims 1-2, 5-6 and 24-27 under 35 U.S.C. §103(a) as being unpatentable over <http://web.archive.org/web/19990125085745/http://fool.com/> (Motley Fool) website; Claims 3 and 4 under 35 U.S.C. §103(a) as being unpatentable over Motley Fool in view of U.S. Patent No. 6,289,353 (Hazlehurst); and Claims 7-23 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Motley Fool in view of “WebQuery: Searching And Visualizing The Web Through Connectivity”, (Nortel).

Motley Fool presents a pre-existing, pre-defined, fixed tab structure depicted on page 4 of the present Final Office Action. The Motley Fool tab structure cannot be changed, neither in order nor in content. In other words, the tabs shown, Features, Messages, Quotes/Data, My Fool, and Logout, cannot be changed to, for example, three tabs, e.g., Specials, New Members, and News, in a dynamic manner as is taught by the present application and claimed by independent Claims 1 and 25-27. Motley Fool does not teach or describe “creating at least one instance of a mapping data structure for a web site, the data structure representing two or more categories”, as recited in Claim 1; “creating an instance of a mapping data structure for a given web site”, as recited in Claims 25-26; and “means for creating an instance of a mapping data structure for a given web site”, as recited in Claim 27.

Moreover, the Motley Fool bulletin board reference, depicted by the Examiner on page 4 of the present Final Office Action, is an ordered and orderly list, not an abstract geometric representation taught by the present invention and claimed in Claim 1. The depicted Motley Fool list is sorted in ascending order according to the date/time field. Those skilled in the art would not

consider such organization computed. According to the terms used in the present application, the word "computed" means "a representation changing dynamically in correspondence with user activities and social interactions as they are received at a website".

It must further be understood that in the present invention, it is the same "abstract geometric representation", that is

1. computed from mapping data structure based on user activities and social interactions; and
2. used to facilitate user socialization.

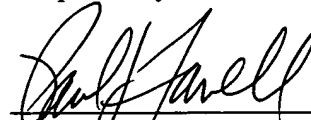
Motley Fool, as is clearly seen from the examples presented by the Examiner, uses two distinct representations, i.e., the view that shows the tabs, Features, Messages, Quotes/Data, My Fool, and Logout, and the bulletin board view which is a sorted list of files, not a geometric representation and in particular not an abstract geometric representation. It can therefore be concluded that Motley Fool does not teach or describe "computing an abstract geometric representation of said mapping data structure for facilitating user socialization", as recited in Claim 1.

With regard to Claims 3 and 4, contrary to the Examiner's statement, Hazlehurst, in columns 12-13 or elsewhere in its specification, does not teach determining behavioral closeness from patterns of use. Hazlehurst, does not teach or describe "one or more subcategories have a degree of closeness", as recited in Claim 3, where the degree of closeness relates to a physical closeness, as recited in Claim 4.

In view of the above remarks and amendments, reconsideration and allowance of amended independent Claims 1 and 25-27 is respectfully requested. Without conceding the patentability per se of dependent Claims 2-24, it is submitted that they are allowable at least by virtue of their dependencies on independent Claim 1. Accordingly, all of the claims pending in the application, namely Claims 1-27, are believed to be in condition for allowance and allowance is respectfully requested.

Should the Examiner have any questions regarding this communication or feels that an interview would be helpful in advancing the prosecution of this application, the Examiner is requested to contact the undersigned attorney.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul J. Farrell", is written over a horizontal line.

Paul J. Farrell

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